

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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|------------------------|---|-----------------------------|
| ----- | X | |
| AIU INSURANCE COMPANY, | | 07 CIV 7052 (SHS) |
| | : | |
| Plaintiff, | : | |
| | : | |
| - v. - | : | MOTION TO ADMIT |
| | : | COUNSEL PRO HAC VICE |
| TIG INUSRANCE COMPANY, | : | |
| | : | |
| Defendant. | : | |
| ----- | X | |

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I Sean Keely, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Mark A. Schwartz, Esq.
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Street, Suite 1800
Chicago, Illinois 60602
Phone: (312) 444-9660
Fax: (312) 444-9287

Mark A. Schwartz is a member in good standing of the Bar of the State of Illinois. There are no pending disciplinary proceedings against Mark A. Schwartz in any State or Federal Court.

Dated: New York, New York
May 30, 2008

LOVELLS LLP
By: 

Sean Thomas Keely (SK-8593)
590 Madison Avenue
New York, New York 10022
Telephone: (212) 909-0600
Facsimile: (212) 909-0660
sean.keely@lovells.com

Counsel for Defendant
TIG Insurance Company

652-7438
MAY 30 2008
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FILED
MAY 30 PM 4:10
S.D. OF N.Y.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AIU INSURANCE COMPANY,

X

Plaintiff,

:

– v. –

:

TIG INUSRANCE COMPANY,

:

Defendant.

X

07 CIV 7052 (SHS)

**AFFIDAVIT OF SEAN
THOMAS KEELY IN
SUPPORT OF MOTION TO
ADMIT COUNSEL PRO HAC
VICE**

STATE OF NEW YORK)

)

ss:

COUNTY OF NEW YORK)

Sean Thomas Keely, being duly sworn, hereby deposes and says as follows:

1. I am Of Counsel with the firm Lovells LLP, counsel for Defendant TIG Insurance Company in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Mark A. Schwartz as counsel *pro hac vice* to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York and this Court.
3. Mark A. Schwartz is a member of the firm Butler Rubin Saltarelli & Boyd LLP, and is a member in good standing of the bar of the Supreme Court of Illinois. An original certificate of good standing issued by the clerk of the Supreme Court of Illinois is attached hereto as Exhibit A.
4. I have found Ms. Schwartz to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

5. Accordingly, I am pleased to move the admission of Mark A. Schwartz, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of Mark A. Schwartz, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the Court grant the motion to admit Mark A. Schwartz, to represent Defendant in the above-captioned matter.

SWORN TO BEFORE ME
this 30 day of May, 2008.




Notary Public

ANDREW M. BEHRMAN
Notary Public, State of New York
Reg. No. 02BE6132944
Qualified in New York County
Commission Expires Aug. 29, 2009

Respectfully submitted,

LOVELLS LLP

By: 
Sean Thomas Keely (SK-8593)

590 Madison Avenue
New York, NY 10022
Phone: (212) 909-0600
Fax: (212) 909-0660

Attorneys for Defendant TIG Insurance Company

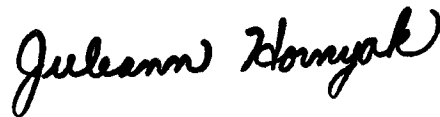
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Mark Aaron Schwartz

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 4, 1999 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Thursday, May 22, 2008.

A handwritten signature in black ink that reads "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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|------------------------|---|-------------------------------|
| ----- | X | |
| AIU INSURANCE COMPANY, | | 07 CIV 7052 (SHS) |
| | : | |
| Plaintiff, | | |
| | : | |
| — v. — | : | ORDER FOR ADMISSION |
| | : | <i>PRO HAC VICE</i> ON |
| TIG INUSRANCE COMPANY, | : | WRITTEN MOTION |
| | | |
| Defendant. | X | |
| ----- | | |

Upon the motion of Sean Thomas Keely, attorney for Defendant TIG Insurance Company, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Mark A. Schwartz, Esq.
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Street, Suite 1800
Chicago, Illinois 60602
Phone: (312) 444-9660
Fax: (312) 444-9287
E-mail: mschwartz@butlerrubin.com

is admitted to practice *pro hac vice* as counsel for Defendant TIG Insurance Company in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: May _____, 2008

United States District Judge

CERTIFICATE OF SERVICE

I am over the age of 18 and not a party to the within action; my business address is:
590 Madison Avenue, New York, New York, 10022.

I hereby certify that on May 30, 2008, I caused a true and correct copy of **Defendant TIG Insurance Company's Motion to Admit Counsel Pro Hac Vice for Mark A. Schwartz** to be served by hand upon:

William A. Maher, Esq.
Marc L. Abrams, Esq.
WOLLMUTH MAHER & DEUTSCH LLP
500 Fifth Avenue
New York, New York 10110
(212) 382-3300

Executed on May 30, 2008 at New York, New York.

I declare that I am employed in the office of counsel for defendant TIG Insurance Company, at whose direction the service was made.



EAMON MASON